

### Remarks

Applicant's representative, Don W. Bulson, would like to thank the Examiner for the courtesies extended during the personal interview conducted on December 5, 2006.

The various parts of the Office Action are discussed below under similar headings.

#### ***Claim Rejections - 35 U.S.C. § 102***

Claims 1-19 are pending in the application. Claim 1 is the sole independent claim. As was discussed during the interview, claim 1 has been amended to include, *inter alia*, selecting a two-dimensional pattern wherein said pattern comprises a multiplicity of cells, each cell having  $n$  regions wherein  $n$  is the number of prepared base images and each region has different, distinct two-dimensional coordinates.

Claim 1 has also been amended to include a post-process step, namely outputting the merged image in at least one of a computer readable and/or a physical form. This claim amendment was made to alleviate any possible concerns related to 35 U.S.C. §101, which were raised during the interview.

At the interview, it was agreed that such amendments would result in the withdrawal of the current rejections of record. Since claim 1 has been amended accordingly, the Examiner's rejections are now believed to be moot.

U.S. Patent No. 6, 091,484 to Carter was the primary reference relied upon by the Examiner for the prior rejections. Amended claim 1 is directed to a two-dimensional pattern wherein said pattern comprises a multiplicity of cells, each cell having  $n$  regions wherein  $n$  is the number of prepared base images and each region has different, distinct two-dimensional coordinates. In addition, the merged image template is also divided in the selected pattern that is applied to the base images.

In contrast, Carter has been found to teach that a first pattern is applied to the base images to divide the base images. (See Figure 5 and supporting text at (Col. 5, line 50- Col. 6, line 20). A different pattern, which is a one-dimensional pattern (Figure 6), is then used to create the merged image, as illustrated in Figures 7-9. Thus, Carter

has not be found to select a two-dimensional pattern wherein said pattern comprises a multiplicity of cells, each cell having n regions wherein n is the number of prepared base images and each region has different, distinct two-dimensional coordinates and provide a merged image template that is also divided in the selected pattern applied to the base images.

For at least these reasons, it is respectfully submitted that claim 1 distinguishes patentably over Carter. Accordingly the rejection of claim 1 under 35 U.S.C. §102(e) should be withdrawn.

Claims 2, 4-8 and 11-12 are dependent on claim 1. Therefore, claims 2, 4-8 and 11-12 are patentable for at least the same reasons set forth above for claim 1. Accordingly, the rejection of claims 2, 4-8 and 11-12 under 35 U.S.C. §102(e) should also be withdrawn.

***Claim Rejections - 35 U.S.C. § 103***

The Examiner also rejected claims 3, 9, 10 and 13-19 under 35 U.S.C. §103(a) as being obvious in view of one or more combinations of the following references: Carter, Delhi, DeLeeuw, Yokomizo, Morris, Silvers, Kimura, Ginter. Claims 3, 9-10 and 13-19 depend directly or indirectly from claim 1.

Carter was the primary reference for all of the claim rejections under 35 U.S.C. §103(a). As explained above, Carter has not been found to disclose all of the limitations of claim 1. In particular, Carter has not be found to select a two-dimensional pattern wherein said pattern comprises a multiplicity of cells, each cell having n regions wherein n is the number of prepared base images and each region has different, distinct two-dimensional coordinates and provide a merged image template that is also divided in the selected pattern applied to the base images.

None of the teachings of the cited references when combined with Carter have been found to disclose or reasonably suggest the claimed invention. Accordingly, these claims are believed to be patentable for at least the same reasons set forth above for claim 1. Accordingly, the rejections of claims 3, 9-10 and 13-19 under 35 U.S.C. §103(a) should be withdrawn.

**Conclusion**

In view of the foregoing, request is made for timely issuance of a notice of allowance.

Respectfully submitted,

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